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APR 30 2024

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JO/LNE: USAO 2020R00502

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
DEPUTY

UNITED STATES OF AMERICA

v.

KEITH SMITH,

Defendant

CRIMINAL NO. SAG-21-0286

(Conspiracy to Distribute and Possess  
with the Intent to Distribute Controlled  
Substances, 21 U.S.C. § 846; Possession  
with the Intent to Distribute Controlled  
Substances, 21 U.S.C. § 841(a)(1), Aiding  
and Abetting, 18 U.S.C. § 2; Forfeiture,  
21 U.S.C. § 853).

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SUPERSEDING INFORMATION

COUNT ONE

The United States Attorney for the District of Maryland charges that:

From or about April 2020 through November 2021, in the District of Maryland,

**KEITH SMITH,**

the defendant herein, did knowingly and willfully combine, conspire, confederate and agree with others known and unknown to distribute and possess with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 846

**COUNT TWO**

**(Possession with Intent to Distribute Heroin)**

The United States Attorney for the District of Maryland further charges that:

On or about April 29, 2021, in the District of Maryland, the defendant,

**KEITH SMITH,**

did knowingly and intentionally possess with intent to distribute and a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

21 U.S.C. § 841(a)(1) and 841(b)(1)(B)

18 U.S.C. § 2

**FORFEITURE**

The United States Attorney for the District of Maryland further alleges that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 21 U.S.C. § 853 as a result of the defendant's conviction under Counts One or Two of the Superseding Information.

**Narcotics Forfeiture**

2. Upon conviction of the offenses set forth in Counts One or Two of this Information, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of any such offenses, and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses.

**Substitute Assets**

3. If any of the property described above, as a result of any act or omission of any defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the  
forfeitable property described above, pursuant to 21 U.S.C. § 853(p).

21 U.S.C. § 853

Erek L. Barron/LME

Erek L. Barron  
United States Attorney

*LaRai Everett*

Digitally signed  
by LaRai Everett  
Date: 2024.04.30  
09:24:16 -04'00'

February 9, 2024

Date